# Exhibit 47

#### UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY CAMDEN VICINAGE

**Document 1838-25** 

PageID: 54878

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION

MDL No. 2875

Honorable Robert B. Kugler, District Court Judge

Honorable Thomas I. Vanaskie (Ret.), Magistrate Judge

### **DECLARATION OF ZHANG PEI**

- I am Supervisor of New Drug Strategic Planning Department for Zhejiang Huahai 1. Pharmaceutical Co., Ltd. ("ZHP"), with responsibility for new drug R&D project management and strategy planning.
- I understand that the Court has requested that ZHP verify that the litigation hold 2. notice attached as Exhibit A, and dated November 19, 2019, is the same as the notice sent on December 11, 2019, December 19, 2019, December 20, 2019, and December 21, 2019, to certain ZHP employees outlined on Exhibit B.
- I have reviewed the notice attached as Exhibit A, and affirm that the contents of the 3. notice attached as Exhibit A are the same as the contents of the notice sent in December 2019 to the ZHP employees listed on Exhibit B.
- Further, in reviewing Exhibit B, there are four typographical errors that are 4. corrected as follows:
  - the notice sent to Gu, Ziqiang was sent on November 22, 2019 rather than November 20, 2019 as indicated in Exhibit B;
  - the notice sent to Hu, Ping was sent on November 20, 2019 rather than December 19, 2019 as indicated in Exhibit B;
  - the name Wang, Yuehua, is corrected to Wu, Yuehua; and
  - the name Wang, Yuhua, is corrected to Wang, Yihua.

Case 1:19-md-02875-RMB-SAK

Document 1838-25 PageID: 54879

Filed 12/30/21

Page 3 of 11

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES THAT TO THE BEST OF MY KNOWLEDGE THE FOREGOING IS TRUE AND CORRECT.

Executed on December 2, 2021 in Shanghad (city), (province)

Zhang Pei, Declarant

29, 2/# 12

# **EXHIBIT B**

Name	behalf of Jun Du on	Notice sent on behalf of Jun Du on September 13, 2018	Notice sent on behalf of Jun Du on March 6, 2019	Notice sent on behalf of Jun Du on March 7, 2019	Notice sent on behalf of Jun Du on November 19, 2019	Notice sent on behalf of Jun Du on November 20, 2019	Notice sent on behalf of Jun Du on November 27, 2019	Notice sent on behalf of Jun Du on December 11, 2019	Notice sent on behalf of Jun Du on December 19, 2019	Notice sent on behalf of Jun Du on December 20, 2019	Notice sent on behalf of Jun Du on December 21, 2019
An, Jianguo				_					х		
Arbab, Noor	X										
Arnold, Matthew	X		X								
Ayres, David	X		X		X						
Bao, Chaohua							X				
Bill, Jr., Jon M.					Х						:
Cai, Ping (Dan)						Х					
Chen, Baozhen		X		X		X					
Chen, Boahua						X					
Chen, Q. M.		X		X					X		
Chen, Wei						Х					
Chen, Wenbin		X		X		X					
Chen, Xiang							X				
Chen, Y. F.						X					
Chen, Yingzhi						X					
Chen, Yong									X		
Chen, Yuanyan						X					
Chen, Yuping			T			X					
Cheng, Jie									X		
Cheng, Wei						X					
Dong, Peng		X		X		X					
Du, Jun	X		X		X						
Fang, Yuling	X		X						X		
Farrell, Doug	X		X		X						
Gao, Xiaojun						X		-			
Ge, Jucai		Х		X		X					
Gelineau, Hillary	X		X		Х						
Gergis, Remonda	X		X		Х						

Name	behalf of Jun Du on	Notice sent on behalf of Jun Du on September 13, 2018	behalf of Jun Du on March	Notice sent on behalf of Jun Du on March 7, 2019	Notice sent on behalf of Jun Du on November 19, 2019	Notice sent on behalf of Jun Du on November 20, 2019	Notice sent on behalf of Jun Du on November 27, 2019	Notice sent on behalf of Jun Du on December 11, 2019	Notice sent on behalf of Jun Du on December 19, 2019	Notice sent on behalf of Jun Du on December 20, 2019	Notice sent on behalf of Jun Du on December 21, 2019
Groenewoud, Pieter					X						
Gu, Eric		X		X		X					
Gu, Ziqiang						X					
Guo, Xiaodi	X		X		X						
Han, Fang				X							X
Han, Yang							X				
He, Xin					X						
He, Y. Y.							X				
Hu, Min							X				
Hu, Ping									X		
Hu, Wenping						X					
Hu, Yuelin		Х		X		X					
Hu, Zhicheng							X				
Huang, Luning									X		
Iozzia, John	X		X		X						
Jia, Zhengjun						X					
Jin, Yongjun						X					
Jin, Yun						X	1				
Jing, Jin						X					
Kaufman, Ron	X		X		X						
Keith, Chris	X		X		X						
Kong, Xiaofang (Maggie)	X		X		X						
Kuang, Xiaxia									X		
Kuo, Shenghung	X										
Li, Hongchao						X					
Li, J. Y.						X					
Li, Min		X		Х		X					
Li, Na									X		

Name	behalf of Jun Du on	Notice sent on behalf of Jun Du on September 13, 2018	behalf of Jun Du on March	Notice sent on behalf of Jun Du on March 7, 2019	behalf of Jun Du on	Notice sent on behalf of Jun Du on November 20, 2019	Notice sent on behalf of Jun Du on November 27, 2019	behalf of Jun Du on	Notice sent on behalf of Jun Du on December 19, 2019	Notice sent on behalf of Jun Du on December 20, 2019	Notice sent on behalf of Jun Du on December 21, 2019
Li, Qiangming		X		X		X					
Li, Qing							X				
Li, Xiaoling						X					
Li, Yaohan (Isabel)	X		X		X						
Liang, Zunjun		X		X			X				
Lin, Jie							X				
Lin, Linda	X	Х	X	Х		X					
Lin, Ling									X		
Lin, Mudan							X				
Liu, Nelson	X		X		X						
Liu, Taofang							X				
Liu, Tiyun							X		7		
Liu, X. G.						X					
Liu, Xiaoming		X		X		X					
Liu, Yanfeng (Lucy)						X					
Luo, Guangyu	X		X		X						
Meng, Yanhua (Anne)		X		X			X				
Min, Jin		X		X					X		
Min, Zeqi									X		
Pajoohi, Ken	X		X		X						
Ping, Huling		Х		X					X		
Qiao, Gavin	X				X						
Qiu, Hongchun			X		X						
Qiu, Jane					Х						
Shang, Fei				X		X					
Shang, Peng					X		,				
Sun, Dengxue							X				
Tan, Li							X				

Page 42 of 48 PageID:

Name	behalf of Jun Du on	Notice sent on behalf of Jun Du on September 13, 2018	Notice sent on behalf of Jun Du on March 6, 2019	Notice sent on behalf of Jun Du on March 7, 2019	Notice sent on behalf of Jun Du on November 19, 2019	Notice sent on behalf of Jun Du on November 20, 2019	Notice sent on behalf of Jun Du on November 27, 2019	Notice sent on behalf of Jun Du on December 11, 2019	Notice sent on behalf of Jun Du on December 19, 2019	Notice sent on behalf of Jun Du on December 20, 2019	Notice sent on behalf of Jun Du on December 21, 2019
Tang, Fengyang							X				
Tang, Yiming	X		X		X						
Tao, Juan			-			X					
Tian, Yun							X				
Tong, Nan						Х					
Tong, Zengyuan							X				
Tsai, Ph.D., Wen-Chien (Eric)	X		X		X					-	
Wang, Dongqin						X					
Wang, Hai	X		Х		Х						
Wang, Haiqin							X				
Wang, Hui									X		
Wang, Jian		X		X							
Wang, Jie (Legal)		X		X							X
Wang, Jie (Sales)						X					
Wang, Jun										X	
Wang, Lijie	X		X		X					_	
Wang, Lina							X				
Wang, Lingfang									X		
Wang, Ma	X		X						X		
Wang, Minfa	X		X		X						
Wang, Peng		X		X		X					
Wang, Youhu						X					
Wang, Yuehua							X				
Wang, Yuhua							X				
Wen, Ping			_				X				
Wu, Lina						X					
Wu, Tina	X				X						
Xi, Lily	X		X		X						

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Xiang, Jn		Х		X					X		
Xianyi, Xu	X	X	X	X					X		
Xie, Chongjun						X					
Xie, Mengmeng							X				
Xie, Yuanyuan					X						
Xiong, Sophie			X								
Xiong, Ying		Х				X					
Xu, Baoxia							X				
Xu, Mi						X					
Xu, Min									X		
Xu, Pijie		Х		Х		X					
Xu, Weiwei						X					
Yan, Fengfeng							X				
Yang, Chun							X				
Yang, Yang									X		
Ye, Cunxiao (Jenson)		X									
Ye, Jian							X				
Ye, Tree	X										
Ying, Chen	X		X		X						
Yu, Xiao							X				
Yu, Zhongshui	X		X		X						
Zeng, Guang							X				
Zhang, Danyang									X		
Zhang, Fuyu									X		
Zhang, Kathy	X		Х		Х			-			
Zhang, Mei		X		X					X		
Zhang, Minli		X		Х		X					
Zhang, Pei			X								X

Name	behalf of Jun Du on	Notice sent on behalf of Jun Du on September 13, 2018	behalf of Jun Du on March	Notice sent on behalf of Jun Du on March 7, 2019	Notice sent on behalf of Jun Du on November 19, 2019	behalf of Jun Du on	Notice sent on behalf of Jun Du on November 27, 2019	Notice sent on behalf of Jun Du on December 11, 2019	Notice sent on behalf of Jun Du on December 19, 2019	Notice sent on behalf of Jun Du on December 20, 2019	Notice sent on behalf of Jun Du on December 21, 2019
Zhang, Renguo		X		Х							X
Zhang, Shiwen		X		X							
Zhang, Tian						X					
Zhang, Wenling		X				X					
Zhang, Xianhua						X					
Zhang, Xianliang							X				
Zhao, Caifeng						X					
Zhao, David (Dachuan)	X		X								
Zhao, Jianzhi								Х			
Zhao, Louis										X	
Zhao, Xiaohong				X		X					
Zhao, Yueding						X					
Zheng, Gaozhe						X					
Zheng, Meng								X			
Zheng, Youqing						X					
Zhong, Fengg (Vicky)						X					
Zhong, Sheng						X					
Zhou, Huoming							X				
Zhou, Qiang						X					
Zhou, Sandy	X		X		X						
Zhou, Ting (Ada)				X		X					
Zhou, Xiaohui					:		X				
Zhou, Yong		X		X		X					
Zhu, Jenny		Х		Х					X		
Zhu, Kaiwei									X		
Zhu, Lesley	Х		X		X						
Zhu, Wenquan		X		X		X					
Zhu, Xiaoren						X					

Filed 07/23/21

Page 45 of 48 PageID:

#### Litigation Notices Issued by ZHP Parties as of December 30, 2019

Name	Notice sent on	Notice sent on	Notice sent on	Notice sent on	Notice sent on	Notice sent on	Notice sent on	Notice sent on	Notice sent on	Notice sent on	Notice sent on
	behalf of Jun	behalf of Jun	behalf of Jun	behalf of Jun	behalf of Jun	behalf of Jun	behalf of Jun	behalf of Jun	behalf of Jun	behalf of Jun	behalf of Jun
	Du on		Resiliant Constitution (Constitution Constitution Constit	Du on March		Du on	Du on	Du on	Du on	Du on	Du on
	September 13,	Bandeli, ranggan wanang uun filo uu uu fi	6, 2019	7, 2019	Pikhadi kelinawan asarin Biru (Vali	Visit IV SENI/A septicitiva va Visio esta Sull		Paritamente en la contraction de la contraction	EPANATUS NO SENSO	Blueterne architection (Secreté à C	December 21,
	2018	2018	a Paga		2019	2019	2019	2019	2019	2019	2019
Zhu, Yan		X		X					X		
Zhu, Yonghua		X		X							X